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July 3, 2018

Lloyd Epstein, Esq. Epstein and Weil 225 Broadway, 12<sup>th</sup> Floor New York, N.Y. 10003

> Re: U.S. v Saul Rendon Reyes Cr. 15-348

Dear Mr. Epstein:

At your request, I have conducted an investigation into Mr. Saul Rendon Reyes' social history in an attempt to determine if there are any mitigating factors that might influence the Government's disposition in this case.

In compiling the information for this report, I met with Saul for a total of 24 hours. In addition, I have reviewed the following documents:

### I. Legal Records

Indictment, Cr. 15-348, July 16, 2016 Arrest Records: De Kalb County, Montgomery, Alabama (ICE) 3/9/2010 & 1/11/2011 Pre-sentence Investigation Report, April 4, 2018

### INTRODUCTION

In November, 2015, Saul Rendon Reyes and various family members of the "Rendon-Reyes Trafficking Organization were arrested.

In April, 2017, Saul Rendon Reyes pled guilty to

Count 1: Racketeering
18 U.S.C. § 1962 ( c ) § 1963
Count 9: Sex Trafficking
18 U.S.C. § 1591 (a) (1), 18 U.S.C. § 1591 (b) (1)

Saul is currently remanded to the Metropolitan Detention Center in Brooklyn while awaiting the disposition of his case.

While this report does not seek to excuse Saul's behavior, I believe that his involvement in this matter is directly related to coming of age in Tenancingo, in the State of Tlaxcala, in Mexico.

The following introduction to the development of the Sex-Trafficking industry in Tenancingo provides an ethnographic backdrop to the environment in which he grew up and his involvement in this case.

These macro-environmental factors include, but are not limited to, poverty, his role in family of origin, the traditional roles of males and females in the culture, and societal norms that have contributed to the continued existence of the sex-trafficking industry in Tenancingo, Mexico. This information is critical to any understanding of Saul's psycho-social functioning, his cognitive limitations, and his involvement in this case.

### Ethnographic factors that have created Tenancingo as the Epicenter of Sex Trafficking

A Tenancingo legend holds that pimping goes back to the arrival of the Conquistador, Hernan Cortes in 1519. The indigenous warrior, Xicotencatl is said to have offered Tlaxcaltecan virgins to the conquering Spaniards in exchange for blankets.

In the Modern Era, Tenancingo has gained notoriety for being the "Epicenter of Sex Trafficking" for Mexico, North America, and even Europe. The history of sex trafficking goes back to the 1950's after industrialization, when working age men returned home from neighboring states to find few opportunities for employment beyond badly paid factory jobs. Pimping and trafficking, which they had sometimes seen away, was a means of getting ahead and many set up small, family-run sexual exploitation rings.

As noted in the Daily News (June 3, 2012), this industry has been going on for years. In a town of 11,000, 3,000 are reputed to be employed in the sexual trafficking industry. Young boys grow up wanting to be part of the industry. It is customary for the best looking boys in the family to be the ones chosen to troll the parks and public spaces, usually in fancy cars, looking for potential victims. The usual way is to seduce unsuspecting, poor, young girls, often minors, with promises of marriage and a home, into the world of prostitution.

The sex trafficking industry in Tenancingo is maintained by ten main families, with connections to each. These families are inter-generational and inter-familial. Grandparents, parents, aunts, uncles, children, grandchildren, cousins, nieces and nephews are involved with the industry. In addition, extended family members who are inter-related through the "Compadrazgo system"

<sup>&</sup>lt;sup>1</sup>See: Fusion Productions, Documentary, "Pimp City" You Tube (2014). Guardian, U.K.

(godparents' relationship) are also involved.

At a child's birth, his/her parents will select close family friends or relatives to serve as the child's godparents. This role comes with obligations to support the child throughout his/her life. The child is expected to obey and respect the Godparent in the same way he/she respects the parent. Thus, it is possible for one female to be a trafficker for one family, while at the same time being a "prostitute" for another because of inter-familial connections.

Sex trafficking is an inter-generational way of life in Tenancingo. And tragically, the "perpetrators" are themselves victims of a system that offers no way out. Grandmothers, grandfathers, mothers, fathers, siblings, aunts, uncles, cousins, nephews and nieces are all involved in the inter-geneational, inter-familial sex trafficking industry that has supported Tenancingo's economy and its residents for more than fifty years.

Prostitution is legal in Mexico. The townspeople know what is going on, and many know at least one person who is involved, if they are not involved themselves. Many prefer to turn a blind eye to it out of fear that they, or a family member, will be harmed. Some of the patrons of the sex industry are policeman and judges. The ten most powerful families operate much like the Mafia, they control the political and economic life of the town.<sup>2</sup>

The town of Tenancingo is known for being a place where men live off their women whom they send to America to work as prostitutes. If a child is born to one of these women while working in the trade, that baby is either aborted, or sent back to Mexico to the paternal grandparents' home to be raised in the family business. The sex-trafficking industry in Tenancingo has operated from "the cradle to the grave." It is a self-perpetuating system and like cancer, it has completely metastasized, taking over the "body" of the town and spreading throughout Mexico, America, and even Europe, leaving many victims in its wake.

Because of poverty and lack of opportunity, young boys quit school early, often as early as first grade, to go to work in the fields, or they aspire to become "Padrotes" (Pimps), like their grandfathers, fathers, and other male family members because padrotes have money, power, control, big houses, fancy cars and many women. It is a dream come true for young, impressionable boys who have no other means of survival or making a living.

Tragically, these young boys are as much victims as they are perpetrators because they know no other way of life. Family members encourage, and expect them to follow in the path of their parents and grandparents. They may be physically abused if they refuse to listen to authority figures. They are enticed at an early age to be a "man." And in Tenancingo, being a man means becoming a "Padrote."

In Tenancingo, young boys look forward to the February carnival that takes over the town.

<sup>&</sup>lt;sup>2</sup>See "Pimp City;" www,theguardian./com/world 2015, Apr.;

It has been dubbed the "Festival of the Padrotes" because padrotes, dressed in masks and carrying whips, settle their business scores. The padrotes come from near and far. Those padrotes who live and work in America return to take part in the festival. They often bring their prostitutes. Elaborate displays of "whipping" dances take place. And the "whip," symbolic of power, control and domination, is ever-present at this festival, like a writhing snake, reminding the townspeople of its ominous power.

In indigenous cultures, the snake has symbolic meaning. In a culture that venerates "Machismo" and the submission of women, these outward symbols are effective subliminal influences on a young boys' mind. The February town festival represents a "male rite of passage."

## The Role of men and women in traditional Hispanic culture

In traditional Mexican families, girls are socialized to obey and respect male authority figures, starting with their relationship with their fathers, and continuing throughout their lives in all subsequent male-female relationships. This socialization is even more common in poor, indigenous families, where many of the girls leave school around third grade because educating girls is not valued.

This early socialization has its roots in the culture of "Machismo," a term used to describe the traditional patriarchal male in Hispanic and Mexican families who expect to be viewed and treated with the respect that comes with being the "authority" figure by their wives and children.<sup>3</sup> Girls are taught from an early age that they must be obedient, submissive, subservient, and loyal. They must not question authority figures; to do so is considered "disrespectful" and such behavior will be punished with beatings from a father, husband or other authority figure.

Traditionally, "Macho" men are expected to be responsible, to protect their wives and children from outside dangers, and to take care of their families.

It is also noted that the negative aspects of "Machismo" include oppression, aggression and degradation of women, as well as hypersexuality.<sup>4</sup> Boys learn that to be a man means that they can abuse, intimidate and violate their female family members, wives, children and siblings. And the women become conditioned to their subservient role, no matter what the cost to themselves and their mental health.

Men learn that it is acceptable to have a wife and a mistress as well as multiple women on the side. It is considered a male right and privilege. They learn that they can drink, gamble and carouse, and still be respected. They learn that they have power and coercive control over all female

<sup>&</sup>lt;sup>3</sup>See: Monica McGoldrick, Joe Giordano, John K. Pearce, In: *Ethnicity and Family Therapy*, 2<sup>nd</sup> Edition (1996), Chapters 12&13.

<sup>&</sup>lt;sup>4</sup>See Manuel de Pena: Class, Gender and Machismo: The "Treacherous Woman." Folklore of Mexican Male Workers. Gender and Society, March, 1991. Vol. 6#1, 36-40.

members of their household.

### The Rules of The Sex Trafficking Industry

Duplicity and deception is the name of the game. Young pimps promise girls hope, the hope of respectability – marriage, a home, a better life. They promise unsuspecting young girls, usually virgins, love. They take them out and seduce them with small gifts, chocolate and sometimes even stuffed toys. They promise that by coming to America, even illegally, the girls will be able to work and will be given "family protection."

The girls, naive, poor, and uneducated find themselves caught up in the web of deception. They want to be loved, to escape the abject poverty into which they are born, to be "taken care of." However, they have no idea what awaits them once they are seduced into believing that the handsome male who has just chatted to them, will ultimately end up enslaving and entrapping them against their will. They are unsuspecting victims, too naive to know what awaits them. And once they learn, there is often no way out. Sometimes they want to commit suicide, sometimes they look for other ways out. Some become cooperating witnesses in order not to be deported or incarcerated.

Female relatives are coerced by their family members to become both traffickers and trainers of other prostitutes, and sometimes prostitutes themselves. They also become money launderers without even realizing what they are doing.

Older and more seasoned females indoctrinate the young girls into the profession. They teach them to put on condoms, to dress in a provocative manner, and to do as they are told. They frequently have no choice in the matter, since they are also "entrapped in dual roles" from which they, too, have no means of escape.

These females, often introduced as "Aunty" control the girls' bodies in the same way that they are controlled by their male family members. They are simply one more employee in the family's chain of command. Sometimes, because of inter-familial connections, they can become a sex trafficker for one family, a "driver" for another, and a prostitute for another. They remain involved because of fear; the fear that they, their children, or another family member will be harmed and even killed.<sup>5</sup>

# Hierarchical Structures and Role Responsibilities in the Sex Trafficking Industry

As noted in many sex trafficking cases, men and women have specific functions and roles in the industry as noted below:

The Coyote: The illegal guide hired to ensure that the person coming into the U.S.A. illegally will make it over the border.

<sup>&</sup>lt;sup>5</sup>Anecdotal history based on my involvement with other defendants, both male and female.

The Padrote (Pimp): Usually young boys who are the best looking male in the family. In Mexico, their function is to procure young girls by promises of marriage, a better life, as noted elsewhere. Once they have achieved their goal, they then accompany the girl to the United States and oversee her socialization into the industry.

The Driver: these are men, and sometimes women, who are part of the enterprise. They transport the girls from one location to another and wait until the work is done. Sometimes they may have a dual role e.g. they may also be the girl's pimp.

The Chica Card Distributor: These are the people on the street corners, handing out "cards" advertising services. The "cards" may offer phony services, but ultimately all result in providing telephone numbers for potential clients to obtain the prostitutes' services.

Finally, two more cultural differences are important to the maintenance of the industry, the lack of education in Mexico and the place of "Verguneza" (Shame) in the culture.

#### The difference between the role of education in Mexico and in America

Lev Vygotzky, a seminal thinker in cognitive development believed that culture and social influences play a pivotal part in the child's higher mental functions. This is particularly true in Mexico where the family's expectations and the school's expectations of what constitutes a "good education" may be very different from what is expected in the United States.

"In rural Mexican school, students grow up playing only with siblings and cousins. They do not have any exposure to life outside their family. In addition, in Rural Mexico, parents have a different set of expectations for what they consider to be a "a buena educacion" (a good education) than their American counterparts. For Mexican parents, the concept of a good education is far broader than here in the United States and does not only encompass academic performance, but what it means to fit into cultural norms. Parents expect the school to reinforce family and cultural values such as respecting elders and behaving properly. Students are not expected to have an opinion, or speak up in class as they do in America. Respect includes not acting out in public, not interrupting or bothering adults, and obediently complying with an adult's request."

These expectations do not take into consideration the child's learning abilities, or his/her cognitive deficits. Many defendants involved in sex trafficking cases leave school in first grade, and often do not continue beyond third grade. Many have undiagnosed, untreated cognitive limitations, and are illiterate. Thus, many defendants who are arrested as adults are not functioning on an adult developmental or cognitive level.

# The role of "Verguenza" (Shame) in the Mexican Culture

<sup>&</sup>lt;sup>6</sup>See Helping students from rural Mexico feel comfortable in your classroom. Learn North Carolina. http://www.w.learnnnc..org/lp/pages/933

The Mexican culture is a "shame-based" culture in contrast to Western Culture which is guilt-based. Because of a deeply ingrained sense of shame, many young girls cannot leave their perpetrators because they do not want their parents or family members to discover that instead of "getting married" they are prostitutes. As one defendant said years ago, "I cannot go home because I have bought dishonor to my parents, my "boyfriend" promised marriage and my father believed him. He made fun of my father and disrespected him, I can never go home." Many women are too ashamed to go home. And, often, many men are ashamed of what they have done in order to remain connected to their family of origin.

### Saul Rendon Reyes: Background History

Saul Rendon Reyes was born on December 20, 1977 in San Miguel de Tenancingo in the State of Tlaxcala, Mexico. He lives in a municipality of Tenancingo, with a population of 700. He is the third of six children born to the marriage of his parents, Jose Nolasco Rendon-Rojas and Maria Ana Reyes-Parada. At the time of Saul's birth, his father was approximately 20 years old, and his mother was about the same age.

Saul's oldest sibling, Alejandro is eight years his senior. Saul and Alejandro do not share the same father. Saul's father also produced other children with women outside his marriage. Maria Ana Reyes-Parada was a child when she gave birth to his older brother, Alejandro; she was around thirteen years old.

Maria Ana Reyes-Parada gave birth to five children with her husband, Jose Nolasco. Guillermina is forty-six years old, Saul is forty years old; his brother, Jovan is 34 years old, his brother Francisco is 29 years old, and his sister Zuleika is 28 years old, single and the mother of two children. She is not involved with this offense and she lives in Mexico.

Saul's mother, Maria Ana Reyes-Parada is currently incarcerated in Mexico on charges related to this matter. Maria is now in her Sixties and suffers from Diabetes.

Saul's oldest brother, Alejandro, was deported to Mexico, he was connected to the instant offense. Guillermina, Jovan, and Francisco are also co-defendants in this matter as are several other family members including his uncle, Severiano Martinez; cousins Odilon Martinez Rojas, Jose Rendon-Garcia and Felix Rojas. Saul reported that some of the above-named relatives were incarcerated in Mexico before being extradited to the United States.

## The Early Years: Living with his paternal grandparents

Saul reported that he "had difficulty remembering anything about his life before age five." This inability to remember is often a symptom of the child's exposure to trauma, and I believe, based on Saul's childhood memories, that his amnesia has its origin in a history of childhood trauma as noted elsewhere in this report.

#### Saul grew up in abject poverty

In recalling life at his grandparents' home, Saul recalled that he grew up in an overcrowded, one-room, wooden shack. "There were too many people, we were around ten, we all slept on a dirt floor. If we wanted to relieve ourselves, we had to go outside. The house was in a poor neighborhood with no infrastructure. There was no water, but the house had electricity. The roof was made of tin. When it rained, the dirt roads were full of mud."

Saul recalled that his grandparents, parents, brother Alejandro and sister Guillermina and Aunts Flora and Irma, Uncles Manuel and Felix and their various children, all lived in the same cramped room. Sometimes his grandfather's friends used to come around too. Saul reported that ten people lived in that one room, sometimes more.

### Saul's grandfather and father were always drunk

"Life was rough. it was all about survival." Saul does not know the word alcoholic, however he does know that his grandfather and father were always drinking, "they used to get drunk." His father's behavior was violent and he used to hit his mother if she didn't get the food to him on time. She had to do as she was told."

### Saul is the victim of physical abuse

Saul witnessed his father hit his mother, but he tried to minimize his father's abusive behavior towards his mother. He did not minimize his father's abusive behavior towards himself. "My father used to beat me a lot. I got many beatings, I had welts on my body because he beat me with his belt." The beatings were done on his shoulders and on the top of his clothes, but they were so strong that his clothes did not protect him from developing welts. "My father used to twist my ear, he did it often, and I still have a scar." Saul reported that he was the black-sheep of the family because he was disobedient. He also recalled his father calling him "Pendejo" this was a very pejorative word, meaning pubic hair.

Saul explained that his brother, Alejandro left home when Saul was eight or nine years old to go to live with his relatives. At that time Saul did not know they didn't have the same father. After Alejandro left, Guillermina and Saul remained at home. Shortly thereafter, Guillermina left the house, she went to live with some of her mother's relatives.

Saul was left at home to take care of his younger siblings. He was expected to do the chores in the house, it was non-stop orders. Saul felt like a slave. He resented having to look after the animals (donkeys) and also having to look after his younger siblings. If he didn't do what he was told, his father beat him. His mother couldn't protect him, she couldn't protect herself from her drunken husband.

Throughout the discussions of physical abuse, Saul started to dissociate, then he started to

shake; he could not speak, then he began to cry. He described feeling all alone and different from his siblings. He also described being very different from other kids at school. "I smelled. I smelled bad. I smelled of the garbage that my family collected from the municipal dump."

### Life at the Municipal Dump, Age 5-8

Saul reported that his parents and uncles used to work in "Trash." During that three-year period, his family did not live with his grand-parents, they lived in "paper houses." Saul reported that the floors were dirt and if they could find clothes or nylon, they made a roof to stop the rain from coming in. There was barely enough food to survive, "I had to think about keeping the food or selling it. We had no water or anywhere to wash. My uncle used to bring water so we could wash."

"We used to leave the house around 5.00 am in the morning; sometimes we went by foot, sometimes by donkey, it took a couple of hours to get there. Everyone was expected to forage through the garbage dump looking for food, rotten or not. Whatever was found was loaded up on a donkey and later sold."

### Saul gets suspended from First Grade, age 8

Saul did not start school until he was eight years old. He was constantly made fun of by his classmates, they called him names and tormented him. He never learned to read or write. Everyone laughed at him and told him he smelled of garbage because his clothes came from the dump. Saul reported that he was ashamed, everyone else had shoes, but he went to school barefoot.

Saul was embarrassed recounting the circumstances that led to him being kicked out of school during his first grade year. He and a friend knocked over a basket of quesadillas that someone had brought to sell. He was immediately suspended, but not his friend. He was humiliated. He couldn't read or write, and he had difficulty learning. He was the only one in his family who was illiterate. In this country, he would have been evaluated for learning problems and other cognitive limitations, but not in Mexico. Instead he was called dumb-ass and made to feel stupid. He was beaten, and seen as the family scapegoat. After his suspension, he was expected to work or take care of his siblings.

Eventually Saul's family stopped working in the dump and his father found a job in construction. His mother continued to survive doing whatever she could. Guillermina went to work as a domestic, she was barely a teenager at the time. He reported that she moved to Mexico, D.F.

Saul reported that his father told him everything he did was to teach him, including his harsh discipline, but Saul hated being at home. He was constantly getting into trouble because he couldn't control his younger siblings when his parents were gone. He was embarrassed because he was illiterate, he hated being unable to read and write and he had few opportunities for employment. He was tired of having to take care of his siblings and getting into trouble if they didn't mind him.

#### Family splits and cutoffs

In speaking about his family, Saul reported that his siblings went for long periods of time not being in contact with other family members. This pattern started in his childhood after Alejandro went to live with his biological father's family and Guillermina went to live with her mother's family. There was constant coming and going. Saul's younger sister, Zuleika also moved in with their mother's relatives. There was very little stability in Saul's life. His father worked two or three hours a day outside of the house; when he returned he used to drink until he was drunk.

## Saul's father said "No" to getting involved in Prostitution

Saul spoke about his relatives and about prostitution. "Some people have large houses and dress well. Some of my friends chose to get involved and so did some of my relatives. However, my father avoided it. My father kept away from it. He used to work in construction and he taught me to be straight. My mother's family were also straight. My father didn't want to end up in the situation that I am in now."

Over the years, Saul became aware that many members of his family and extended family were involved with prostitution, but he knew to turn his head away, and to not ask questions. He saw that some of his father's relatives lived well, but he also knew that his father would not tolerate Saul going down that path.

#### THE ADOLESCENT YEARS

Saul recalled that growing up in Tenancingo, boys grew up thinking about becoming a pimp. He even recalled the February Carnival where the townspeople dressed up in costumes, masks, and did elaborate whipping dances, but he knew better than to get involved in prostitution. Instead, he waited for the first opportunity to leave to seek a job elsewhere.

When Saul was fifteen years old he moved to Puebla, a city two hours away. He reported that he found a job selling soda for a man who had a stand outside the bus station. He used to stay at his employer's house, and once again he reported not having enough to eat.

In 1994, Saul moved to Papaloca to live with Guillermina and her husband Roberto. Guillermina was like a mother to him, she loved him dearly. At that time, Roberto was working as a car mechanic and Saul knew that if he went to live with them, then he would be able to help Roberto in the shop. At that time he dreamed of fixing cars. While there, he met Aurea Rojas who lived across the street.

### Saul falls in love with Aurea, age 17

Saul recalled that he fell in love at first sight when he saw Aurea; he still remembers what she was wearing, "I saw her immediately, she was wearing red pants and long boots." He said in

Spanish, "the arrow hit us" meaning that it was an instant attraction. When he met her, she was taking tacos to her older brother.

Saul wanted her to fall in love with him, she was older than he was. Unlike Saul, Aurea had finished primary school. He reported that she tried to teach him how to read and write, she also tried to teach him to add and to multiply. Within eight days, he reported that they became boyfriend and girlfriend. He reported that he used to sing to her.

Aurea came from a family of fifteen children, seven were living at home when they met. Within a year, Saul and Aurea had a civil marriage, there was no party.

#### Saul and Aurea move to Queratero, circa 1995

Following their marriage, Saul and Aurea moved to Queratero because her brother-in-law Daniel Bonilla had a beauty shop there. After they arrived, Daniel taught both Aurea and Saul how to cut hair. He didn't pay well and there was friction. Saul reported that they couldn't continue to live with Daniel because of the friction.

Saul reported that Daniel paid Aurea, but he didn't pay him. Initially Daniel was supposed to pay him for opening and closing the store in addition to the number of hair cuts he gave, but he didn't pay him. Saul reported that he had to go to work for a different boss.

During that period of time, Aurea gave birth to their first son. Ismael Alejandro was born on June 1, 1996. Aurea gave birth to their second son, Saul Jonatan on April 1, 1998. Following Saul's birth, he moved back to Tenancingo and went to work in a tile factory. At some point, Aurea returned to Papaloca to live with her family.

Currently, his wife and two sons live in San Miguel de Tenancingo. They have not spoken since 2016 because he can't afford to contact her, not even by mail. His sons are working in factories and are aware of his current situation, and according to the PSI, they are supportive.

## Saul entered the United States on multiple occasions between 1999 until his arrest in 2015

Saul initially entered the United States illegally in 1999. He reported that Guillermina sent him 1500 dollars of 3000 dollars to pay a coyote to bring him to the border, he was supposed to pay off the balance, (1500 dollars) after he arrived and found employment. Saul reported living with his sister and her husband at two addresses: 2106 30<sup>th</sup> Street and at 4018 81<sup>st</sup> Street.

Saul has entered the United States illegally on multiple occasions since his first entry in 1999. He reported that during his time here prior to going into the prostitution business, he worked in Brooklyn at a fish shop on 58<sup>th</sup> Street as well as at a fish shop on Grand Street in Chinatown. In addition, he also worked delivering produce in Chinatown.

Saul reported returning to Tenancingo in 2001 in order to build a house. The house was never completed. Saul described the house as concrete blocks without a roof or a front door.

## Saul re-enters the United States with his wife, Aurea circa 2001-2002

Saul reported that sometime in 2001-2002, he and his wife Aurea came into the United States illegally, their children remained in Mexico with Aurea's parents. Once again, he reported that he had to pay 3000 for a coyote, this time they entered through Nuevo Laredo and upon arrival in the United States, he went to stay at his sister's house on 30<sup>th</sup> Street in Queens. He reported he returned to work at his old job in the fish store in Brooklyn and Aurea worked cleaning houses in Brooklyn.

### Saul starts to have problems with alcohol, circa 2004

Saul reported that he liked always liked to drink beer, but in 2004 he really started to have problems with alcohol. His problems with alcohol became so bad that he and Aurea began to fight<sup>7</sup>. He also reported that he sometimes smoked weed.

Saul recalled that his sister Guillermina was upset about his heavy drinking. Saul did not connect his alcohol problems with those of his grandfather and father. He reported that Guillermina was very upset with him when he started to drink. "I used to come home from work in Chinatown, drink and fall asleep."

After Aurea left him, he continued to work at his job in Chinatown selling produce. He remained there until sometime in 2006 when he returned to Mexico.

It is noted that Saul is a very poor historian, and frequently cannot remember, with any degree of accuracy the dates of significant events in his life. He reported that he returned to Tenancingo sometime in early 2007 for a vacation. He remained in Tenancingo for a few months prior to returning to the United States illegally.

#### Saul kept on going back and forth between Tenancingo and America

Saul went back and forth to Tenancingo, always returning to live with his sister Guillermina and other family members in Queens. Saul reported that when he returned to New York in 2008, he was in contact with Aurea because his son told him that she had returned to New York from Atlanta. Once again, he returned to Chinatown where he always found work.

<sup>&</sup>lt;sup>7</sup>It is noted that in the PSI, section 22, that Saul Rendon Reyes is involved in the prostitution of Jane Doe #2, and that he was in fact violent towards her. I am questioning if he was in fact drinking at that time, since this behavior is not typical of his personality. He did report fighting with his wife, however that was after drinking very heavily. It is also noted that Saul reported to me that he was not involved with prostitution until he went to work with Severiano in Alabama circa 2009.

## Saul's Employment in Chinatown

Saul reported that after he worked in Brooklyn, he started to work in Chinatown. He worked in Chinatown each time he returned from Tenancingo. Saul reported that he worked in a fish store at 272 Grand Street where he was paid around 450 dollars off the books. He also reported that he worked at a place called J.C.'s close to Varick Street where he earned around 370 dollars. He used to deliver produce at that time. This has been corroborated by family members.

#### Saul's fatal foray into prostitution, circa 2009

Saul, like his father, had managed to avoid working in prostitution for many years, despite the fact that many of his close relatives were involved with various aspects of the sex trafficking industry in Mexico and in America.

Sometime around 2012\* he reported that he received a visit from his cousin Severiano who was living in Atlanta. "He asked me how much I was making working in Chinatown and told me that if I went to Atlanta I could make 900 dollars a week and have a car. He wanted me to run one of his houses because he wanted to return to Mexico. Saul, who had no experience in the prostitution business, refused. However, he reported that he got to thinking about it and decided that if he worked for Severiano, then he could earn enough money to open a barber shop in Tenancingo.

The only problem was that Saul, who has limited intelligence and no business ability, once again found that he was being taken advantage of. In many ways, it was a repeat performance of his experience working for Aurea's brother-in-law cutting hair, where he was promised one thing, but discovered that in reality, it was another. While the outcome with Daniel Bonillo, Aurea's brother-in-law was disappointing, the outcome with Severiano was fatal for Saul, who was too dumb to handle the situation. He not only got fired, he also got arrested, and eventually deported to Tenancingo.

#### "Severiano told me one thing, and did another"

Severiano seduced and duped Saul into coming to Atlanta. He never intended to give him his own house (prostibulo), nor did he intend to give him a car or pay him 900 dollars a week. In reality, all Severiano wanted was for Saul to come to Alabama to work for him as a "driver" making deliveries. In the sex trafficking business, drivers are the people who deliver prostitutes to their clients. Severiano wanted to train Saul how to become a driver, but it appears that Saul didn't really understand that at the time.

Saul reported that he traveled to Atlanta by bus, it was a difficult eighteen-hour drive.

<sup>&</sup>lt;sup>8</sup>It is noted that Saul's ability to remember the chronology of significant life events is confused. Severiano actually visited him in 2009, not 2012; Saul was off by two years. Arrest records reviewed indicate that he was arrested on multiple occasions while in Alabama, starting in 2009.

Severiano met Saul in Atlanta and took him to Jemison, Alabama, where he had a three-bedroom trailer which was also being used for prostitution purposes. Severiano trained Saul to be a delivery person. He had to pick up the prostitutes and drive them to their clients. Saul learned the hard way. Severiano fooled him, he did not keep his promises.

Saul reported that his cousin Severiano left for Mexico shortly after Saul arrived in Alabama. He told him to deal with his brother, Odillon while he was away. Shortly thereafter, Odillon told Saul he was fired and to get his things and leave the trailer. Saul was in shock, he had nowhere to go. He had some contacts who were in the same business so he decided to start his own business, but he was not successful. Saul just wasn't cut out for the prostitution business. He just wasn't smart enough to learn the ropes or to stay out of trouble.

Saul was arrested in Jemison in 2009 after arranging to deliver a prostitute to an undercover. He remained in Jemison county jail for six months and then was deported to Mexico. He returned to Jemison again in 2010. In December, 2010 he was arrested for promoting prostitution and robbery in the 3<sup>rd</sup>. In January, 2011, he was deported back to Mexico. He remained in Tenancingo for a few months, before returning to Alabama again.

Saul was arrested in September, 2011 for driving without a licence in Hogansville, Georgia. At that time he gave false information and used his brother Jovan's name. In November, 2011 he was arrested for driving without a licence in Dade County, Alabama.

Saul once again was deported to Tenancingo where he remained until the end of of 2013. In December he reported that he walked to the border and crossed over to the United States in 2014. He returned to his sister's house in Queens. He went back to work in Chinatown at the New York Market on East Broadway.

In November, 2015, Saul reported that he and other family members were arrested for this matter. Since that time he has been remanded at the Metropolitan Detention center in Brooklyn, New York, while awaiting the disposition of his case.

#### Saul Pled Guilty to Racketeering and Sex Trafficking, April, 2017

In April, 2017, Saul and many of his relatives who are co-defendants in this case entered a plea of guilty, as noted earlier in this report. Currently he remains at the MDC in Brooklyn, while awaiting the disposition of his case.

#### DISCUSSION

I have reviewed the PSR prepared in April, 2018 by P.O. Hobart and note that no mention is made of any mitigating factors to be considered at sentencing. Based on the limited family history that Saul provided to P.O. Hobart it is understandable that she came to that conclusion.

Saul is deeply ashamed of his involvement in this case, as he is about his limited cognitive functioning. It is very hard for him to talk in any detail about his life, and he comes across as "not caring."

In fact, Saul appears cut-off from his feelings as if he doesn't care or even have any feelings. However, this lack of affect is typical of people who have experienced ongoing trauma in their life. They appear "psychically numb" and unable to display any kind of emotion. They frequently answer questions in a very restricted manner, providing the interviewer with little information, except the bare minimum required. They often appear to be "callous and unfeeling" when in reality this outside demeanor masks a lifetime of trauma.

However, based on the many interviews I have had with Saul, and the information presented in this psychosocial history, it is clear that there are some mitigating factors that are worthy of consideration at sentencing, as noted below.

These factors affected Saul's ongoing development and psychological functioning, and sadly they are as much a product of growing up in Tenancingo, the epicenter of Sexual Trafficking, as they are growing up in his family of origin. Tragically, Saul Rendon Reyes did not have a chance, he was as much a victim of his environment as many of the Jane Does cited in the PSI.

### I. Saul Rendon Reves Is Cognitively Impaired

Saul Rendon Reyes did not ask to be born with cognitive deficits. He has no control over his genetic history. He did not start elementary school until he was eight years old. He had no social skills and he had spent the last three years playing in a trash heap and living in a "paper house" prior to starting elementary school. That was his normal. He was ridiculed from the start.

Saul remained in first grade for less than nine months when he was suspended. At the time of his suspension, he was unable to read or write. He was also unable to express himself.

Saul felt different, and he was treated differently. He was called dumb and stupid by his father, and beaten mercilessly, but he was never evaluated for any neuro-cogitive deficits. If he would have been raised in this country, his elementary school teachers would have noticed his learning difficulties and he would have had an opportunity to seek help. This wasn't even a consideration in his world. In that regard, Saul was a victim of his environment at a very early age.

During my meetings with Saul, he clearly demonstrated limitations in his ability to comprehend even simple questions. It was very difficult for him to understand the ramifications of the charges against him. Furthermore, he had a great deal of difficulty with memory. At times, he appeared to "blank out."

Saul does not have the cognitive skills necessary for leading or running a prostitution business

While Saul was capable of delivering vegetables to vendors in Chinatown, he lacked the organizational skills and executive functioning necessary to deliver "prostitutes" to customers in Alabama. He is not capable of abstract reasoning, and he lacks the cognitive skills necessary to run a business; especially a business requiring good people skills and the ability to manage money.

Saul was great working in Chinatown as a salaried employee, but he just couldn't manage himself or a prostitution business in Alabama. He failed twice; first in 2009 while working for Severiano, and the second time working for himself. Saul can barely read and write in Spanish, he has rudimentary skills in reading and in adding and subtracting figures. He is greatly ashamed of his cognitive limitations, and often "fakes" it because of the shame associated with being illiterate.

It is noted that in the Hispanic culture, it is considered shameful to admit that someone doesn't understand what is being said. Rather than face the shame of not understanding a concept, or an instruction, Hispanic clients will nod their heads as if in agreement with an authority figure, rather than admit that they just don't understand, or can't read or write.<sup>9</sup>

### II. Saul Rendon Reyes Grew Up In Abject Poverty

Review of Saul Rendon Reyes early years indicate that he grew up in a family where his basic needs were not met. In this country, he would have come to the attention of Child Protective Services because he arrived at school without shoes on his feet. He did not have clothes and he went to school dirty. He smelled so bad that no-one wanted to be around him. He was malnourished and he did not have food to cat.

Saul was a neglected, abused child, who would have been removed from his parents' home had he grown up in this country. Ultimately, he would have been placed in foster care. This was not the case for little Saul. He never came to anyone's attention. He grew up in abject poverty. His home for many years was a "paper house" without a roof, not even protected from the rain. His food was the rotting scraps that he found in the Municipal dump, and even then, this little boy of five years old had to decide if he could eat the garbage or turn it over to be sold. He had no chance at a normal life.

### III. Intergenerational History of Alcoholism and Domestic violence

Saul repeatedly watched his father beat his mother for minor infractions, like not bringing his father his food on time. His mother was in the truest sense, a "servant." As noted earlier, in the Mexican culture, women are supposed to "serve" their fathers and later their husbands.

Saul's mother was pregnant at an early age, she was barely thirteen years old when she had her first child. Later she met and married Saul's father. She knew that she had to obey him, that she

<sup>&</sup>lt;sup>9</sup>Lecture presented by this writer: Texas Tech University Medical School: Department of Psychiatry, Lubbock, Texas, 1981.

had to do what he wanted because she knew the price if she failed to comply. As Saul said, "my mother couldn't stop my father from beating her, so she couldn't stop him from beating us."

Saul's two older siblings left home when they were around eight years old, he remained. He described constantly being beaten by his father. He was powerless to protect his mother, and he was powerless to protect himself. It was worse when his father was drunk.

Saul, like many victims of domestic violence, numbed himself out. In order to survive, he simply "tuned out." He developed symptoms of trauma, problems with memory, and reports constantly "not remembering." I am questioning the etiology of his memory problems, and believe that his memory problems are in fact, in part related to his history of trauma and neglect during his childhood.

### IV. Coming of Age in Tenancingo

As noted earlier, I believe that Saul Rendon Reyes life course' was very much dictated by being born in Tenancingo, Tlaxcala. He was exposed to the sex-trafficking industry from the time he was born until his arrest, as noted throughout this report.

### V. Capacity for Rehabilitation and Acceptance of Responsibility

Saul Rendon Reyes has accepted responsibility for his involvement in this matter by entering a plea of guilty. He is deeply ashamed of the circumstances leading to his arrest, but recognizes that he was part of this operation. He wants nothing more than to serve his term and return to his family in Mexico.

### VI. Saul's Relationship With His Wife and Sons

Saul reports, and the PSR investigation confirms that Aurea and their two sons, Alejandro and Jonatan know about Sauls involvement in this matter and they continue to be supportive. Saul and Aurea are still married to each other. They have been in contact while he has been incarcerated, however because of no access to money, Saul has not been able to communicate with his wife or sons since 2016.

#### CONCLUSION

I believe that Saul Rendon Reyes is a victim of his environment and the abysmal circumstances of his life that have impacted his psychological and emotional development. Despite the horrific nature of this case, he has shown the capacity to retain some measure of humanity.

Saul is deeply sorry for the harm he has caused to his victims, and he wants to make amends to society for his actions. He has had no role models to show him how to be a man. He wants nothing more than an opportunity to make amends, to return to Mexico, and to prove that he is capable of

living a productive, law-abiding life in the years he has left.

Respectfully submitted,

Simone Gordon, D.S.W., L.C.S.W./R

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